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April 8, 2022

Hon. Laura Taylor Swain  
U.S. District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**MEMO ENDORSED**

Re: *US v. Jackson, et. al {Johnny Stevens}*, 21 cr 537 (LTS)

Dear Judge Swain:

I am counsel for Johnny Stevens, a defendant in the above referenced matter.

On September 30, 2021, following his arrest, Mr. Stevens was presented before Magistrate Gorenstein. During the proceeding, Mr. Stevens was released on a recognizance bond. Among other conditions the bond requires location monitoring with a curfew to be set by Pretrial Services.

Mr. Stevens has two jobs. One job is working as a construction site safety manager. Mr. Stevens has undergone training and received OSHA certification in order to qualify for this job. He anticipates this job will be his career going forward. His current employer has a contract with MTA which, at times, requires working overnight shifts which conflict with his curfew.

I have conferred with Mr. Steven's supervising pretrial services officer, Joshua Rothman, about modifying the curfew to allow for overnight work. However, he informs that, as a general policy, Pretrial Services does not consent to modification of a curfew to allow for overnight employment. However, he does inform that, Pretrial does not object to the removal of the location monitoring and curfew conditions of the bond. It is my understanding that Mr. Stevens has been fully compliant with the conditions of his bond.

Accordingly, I respectfully request the bond be modified to remove the curfew and location monitoring conditions.

I have conferred with the Government and they consent to the request.

Respectfully submitted,  
/s/  
Jeffrey G. Pittell

The foregoing application for modification of bond conditions is granted. DE 36 is resolved.  
SO ORDERED.  
4/11/2022  
/s/ Laura Taylor Swain, Chief USDJ

cc: Jacob Gutwillig, AUSA  
Joshua Rothman, USPTO